

Due Date: March 13, 2004

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES**

In re Application of:)	
)	
Inventor: Howard Justin Glaser et al.)	Examiner: William L. Bashore
)	
Serial #: 09/162,685)	Group Art Unit: 2176
)	
Filed: September 29, 1998)	Appeal No.: _____
)	
Title: HTML MAPPING SUBSTITUTION)	
GRAPHICAL USER INTERFACE FOR)	
DISPLAY OF ELEMENTS MAPPED)	
TO HTML FILES)	

REPLY BRIEF OF APPELLANTS

Mail Stop Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Dear Sir:

In accordance with 37 C.F.R. § 1.193, Appellants hereby submit their Reply Brief on Appeal from the final rejection of claims 1-34 of the above-identified application, as set forth in the Office Action mailed July 8, 2003. The Reply Brief is submitted in triplicate.

Please charge any necessary fees or credit any overpayments to Deposit Account No. 09-0460 of IBM Corporation, the assignee of the present invention.

I. ARGUMENTS

The Answer disagrees with Appellants various arguments. The foundation of most of these disagreements relies on the Patent Office's assertion of equivalency between the claimed form and the HTML Form described in HTMLed. Appellants assert that the Patent Office misunderstands

the manner and differences between the terminology as used in the present claims and that used in HTMLed.

In claim 1, there is a relationship between an element (that has been transferred from a form to an HTML page) and an HTML file (associated with the HTML page). Thus, the element in the HTML page has been transferred from a form. In this regard, the claim language clearly indicates that the "form" is a form of one or more elements and one such element is transferred to an HTML page. In other words, as claimed, the "form" is a listing or a form of available elements that may be used in a web page. Such a claimed form is entirely different and separable from an HTML Form defined using a FORM tag as set forth in HTMLed. An HTML Form defined using a FORM tag is a form displayed in a web browser that may be filled in by a user viewing a web page containing the form that is displayed in a web browser. Accordingly, the HTML Form is not a form from which an element can be transferred onto an HTML page as claimed.

With the above understanding in mind, Appellants address each of the arguments asserted in the Answer.

Answer Section "a"

In section "a", the Answer disagrees with Appellants statements that the references fail to provide a mapping from an element transferred from a form to an HTML file associated with an HTML page and displaying such mapping. Specifically, the answer provides:

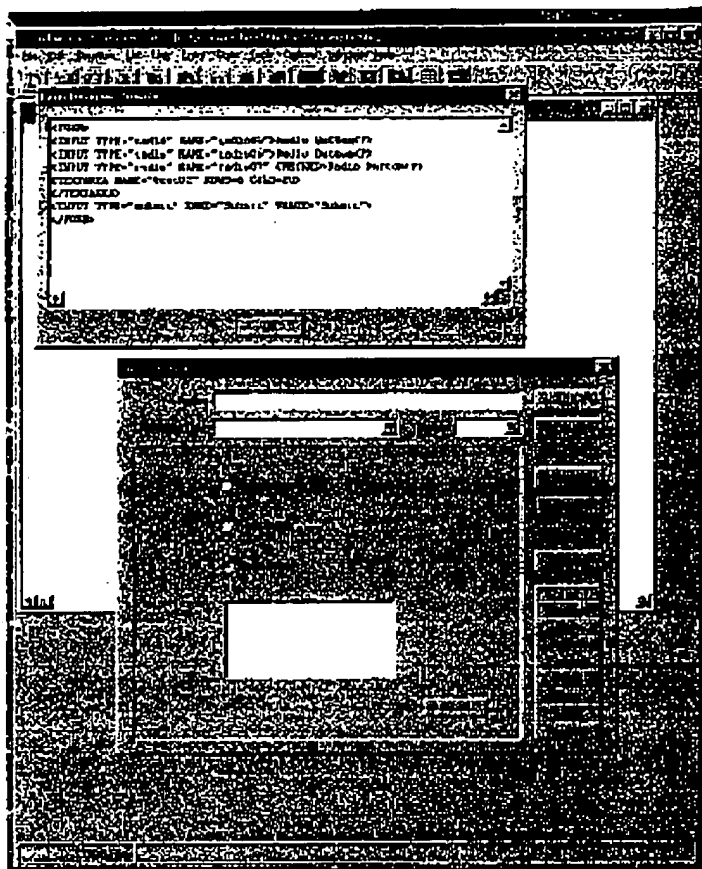
The examiner respectfully disagrees. It is respectfully submitted that Appellant does not specifically define a type of "mapping" within representative claim 1 (other than said mapping is to be displayed, and said mapping indicates the relationship between the element, the form, and the HTML file), and that Appellant is arguing the specifics of the disclosure, not the claims. Although HTMLed does not disclose "mapping" (i.e., HTMLed does not actually disclose the word "mapping"), nevertheless, it is obvious that page 9 of HTMLed displays a form of mapping which shows the relationship between form elements and a form (i.e., elements "Radio Button", "submit" etc. within the top window are all related to the final displayed form shown on the bottom half – the position of each element in the source has a direct bearing on the ordering of the displayed final form elements, and since HTMLed is a form editor, new elements can be added, therefore transferring said new elements to an HTML file, accordingly). Since the displayed source code of the form is contained within an HTML file (a project file), said elements are related to said file, therefore it is obvious to the skilled artisan that a mapping is occurring between said elements, said form, and said file.

The claims first recite reading information. The information comprises a relationship between an element (that has been transferred from a form to an HTML page) and an HTML file

(associated with the HTML page). The claims then recite processing the information to map the element to the HTML. Further, the last claim step displays the mapping on a graphical user interface. As claimed, the display indicates the relationship between the element, the form (that the element was transferred from), and the HTML file (associated with the HTML page that the element was transferred to).

In view of the claim language, Appellants traverse and respectfully disagree with the Patent Office's assertion that the type of mapping is not specifically defined. Again, the mapping is specifically defined in the second claim element where the information is processed to map the element from the form to the HTML file. Further, the mapping is then displayed in a graphical user interface with specific elements contained in the display. Accordingly, Appellant is not arguing the specification but is arguing the claim language.

The Answer admits that HTMLed fails to disclose "mapping" but states that it is obvious in view of page 9 which displays a form of mapping which shows the relationship between form elements and a form. Page 9 of HTMLed provides:



As can be seen by this figure, the "Form Designer: Source" merely contains the HTML code for the HTML Form displayed in the Form Designer. The Answer submits that "since the displayed source code of the form is contained within an HTML file (a project file), said elements are related to said file, therefore it is obvious to the skilled artisan that a mapping is occurring between said elements, said form, and said file." Appellants respectfully traverse such a statement. It appears that you may be able to select one of the elements to be part of the HTML Form displayed on page (9). However, the selected elements are standard HTML Form elements and the HTML source code for the FORM (displayed in the upper half of page 9) merely contain the HTML tags for the various elements.

The claims specifically provide for displaying the mapping that indicates the relationship between the element, the form, and the HTML file. Nowhere on page 9 of HTMLed (or the

remainder of HTMLed) is there any display of a mapping that indicates such a relationship. If fact, Appellants submit that there is no way to interpret the display of multiple windows that contain various elements as equivalent to a particular mapping that indicates a relationship between the various windows. In this regard, the mere simultaneous display of multiple windows does not demonstrate or include a display "that indicates the relationship" between the various windows (or elements contained within the windows). The claims are specific in their recitation of the mapping, the display, and what the display indicates. HTMLed fails to meet these limitations.

Answer Section "b"

Section "b" of the answer disagrees with Appellants' statement that HTMLed fails to indicate a mapping or display that indicates that the element was transferred from a form to an HTML page. In this regard, the Answer relies on page (6) of HTMLed and states that after pressing the "OK" button, representative form code information is transferred to an HTML file. Appellants note that page (6) does not display an "OK" button. Instead, page (6) merely displays a HTML file called "Sample.htm". Additionally, the programming lines contained in the sample.htm file displayed on page (6) merely define an HTML Form containing various elements including 3 radio buttons and a text area. However, nowhere is there any suggestion, implicit or explicit, anywhere in HTMLed that the elements listed in the sample.htm file were transferred from a form.

Examining page (9) of HTMLed it may be seen that various elements may be added to an HTML Form by clicking the various buttons representing the various elements. However, the HTML Form designer is not a "form" as claimed. Instead, it is merely a graphical user interface that allows a user to create an HTML Form by selecting the various elements the user desires in the HTML Form.

Further, nowhere is there any description within the sample.htm file or the Form Designer windows that indicate that an element that exists in a particular HTML Form was transferred from a form of elements as claimed. Again, the claims provide for displaying a mapping that indicates the relationship between the element, the form (that the element was transferred from), and the HTML file. Such claim language requires that the display indicates the form that the element was transferred FROM. HTMLed completely fails to describe the display of any relationship or identify

where the elements listed in sample.htm originated from. Instead, sample.htm (and the remainder of sample.htm) merely indicate standard HTML Form tag elements without identifying where those tag elements came from. To meet the present claim limitations, HTMLed must identify and indicate in a display where the HTML Form tag elements came from – i.e., from a particular form.

Answer Section "c"

Section "c" addresses the Appellants' arguments with respect to dependent claim 2. Dependent claim 2 describes the timing with respect to when information is generated. Again, as claimed (in independent claim 1) the information comprises a relationship between the element (that has been transferred from the form to the HTML page) and the HTML file (associated with the HTML page).

Appellants asserted that HTMLed fails to teach, describe, or suggest the timing when the claimed mapping and information is generated. The Answer disagrees with such an assertion stating that the depression of the "OK" button triggers the transfer of the representative form code information to the HTML file. However, when the transfer occurs is not equivalent to a relationship or mapping as specifically claimed. Again, the claimed mapping is between an element from the form (that the element was transferred from) to the HTML file. Claim 2 provides that such a mapping and relationship is established when the element is transferred. The mere use of the claim language clearly indicates that there are two processes occurring – (1) the transfer of the element from the form to the HTML page, and (2) the generation of the information that identifies the relationship as claimed. Accordingly, the information that is generated is not merely the transfer of an element to a form. These two separate claimed elements and processes clearly distinguish HTMLed from the present invention. Further, the generation of the information is not disclosed whatsoever by HTMLed. Without disclosing the generation of the information, the timing of when the information is generated is not even contemplated by HTMLed.

Answer Section "d"

The Answer Section "d" addresses Appellants' arguments with respect to dependent claims 5, 16, and 27. The Answer states that:

Namo is used to teach the naming of a form, said teaching applied to the naming of the file of HTMLed. It is respectfully noted that, since both HTMLed and Nano are form editors, and since a file can encompass a form by itself (as shown on HTMLed page 9), Nano's form can be named reopened, copied (using copy/paste) into HTMLed's form for further re-editing, and renamed to a new name, etc.

The answer simply indicates the confusion the Patent Office has with respect to the difference between the claimed form and an HTML Form described in Namu and HTMLed. Both Namu and HTMLed are limited to HTML Forms and do not describe the claimed form that contains an element wherein the element (from the form) may be transferred to an HTML page. Merely assigning a name to an HTML Form created in either Namu or HTMLed does not even remotely resemble assigning a name for a form that contains an element that was transferred to an HTML page. Dependent claims 5, 16, and 27 recite that the information (i.e., that is used to map the element from the form to the HTML file) also contains a name of the form that the element was transferred from. No such form exists in either Namu or HTMLed.

To even remotely teach such a limitation, a group of elements in a particular location that may be transferred into an HTML Form would have to be named. For example, if (and only if) the various elements listed on page (9) of HTMLed were grouped together and assigned a name, would there be any name assigned to a form as claimed. Further, the information would then need to contain the name. Instead, HTMLed and Namu merely describe the creation of an HTML Form and then assigning a name to the HTML Form. Such a disclosure does not teach, nor suggest, implicitly or explicitly, the invention as claimed.

Answer Section "e"

Section "e" of the answer addresses Appellants' arguments with respect to claims 6, 17, and 28 which provide for displaying the element name and the HTML file name in a row of a table. The Answer asserts that Arora's Figure 42 depicts the assets of an HTML page.

Again, claim 6 specifically recites displaying an element name and an HTML file name in a row of a table. Nowhere in FIG. 42 of Arora is there any two such items. There are 5 columns depicted in FIG. 42: Name, Type, Location, Size, and Date. If Arora's Name column contains the name of the object on the page, then where is the HTML file name as presently claimed? If Arora's Name column is viewed as the claimed element name, the Answer must be relying on the Location

column to teach the HTML file name that is in the same row. However, a location for the element (which is not described anywhere in Arora) identified in FIG. 42 is not equivalent to the HTML file name as claimed. The claims do not require the location of an HTML File name or a location of an element. Instead, the claims require an element and an HTML file name. Arora fails to describe such a file name. In this regard, Arora does not illustrate nor describe a table having both an element name and an HTML file name in a row of the table.

Last Page of Answer

The last page of the Answer addresses Appellant's arguments with respect to claims 10, 21, 32, 11, 22, and 33. Claims 10, 21, and 32 address the issue of flagging an invalid mapping between the element and the HTML file. Further, to flag the mapping, a project file is read, the HTML filename is extracted, a search is conducted using the extracted filename, and if the filename is not found, the mapping is flagged as invalid.

The Answer provides that when any file is opened, the filename is extracted, the file contents are read by the HTMLed application. Further, the Answer relies on Lisle to teach indicating a link is good or bad. The Answer then notes that if an HTML form file cannot be found by the system, it is obvious when the form file is called.

Again, the Answer uses the term HTML Form to meet the claimed form element. As described above, these terms are clearly distinguishable and are not equivalent. Further, Appellants traverse the assertions in the Answer. Appellants assert that when a file is opened, it is unknown if the filename is extracted. None of the cited references indicate the extraction of a file name when a file is opened. Further, the answer provides for extracting the name of the file that is opened. The claims provide for extracting an HTML filename from a project file and not extracting the name of the project file.

In addition to the above, Lisle merely teaches a data processing system and a method for creating a link map. The link map described in Lisle has nothing to do with the art from HTMLed or Namo. Further, there is no suggestion to use any link map whatsoever in HTMLed or Namo. In fact, HTMLed does not mention links or maps whatsoever.

Claims 11, 22, and 33 address how to process a modified mapping. Specifically, a modified

mapping is accepted and then stored in the project file. The Answer states that since HTMLed is a form editor, mappings can be modified. Appellants cannot identify anywhere in HTMLed or any of the prior art cited that establishes or describes the principle that mappings may be edited in a form editor. In this regard, the Answer is the first time that any such principle has been asserted by the Patent Office. Further, in view of the above arguments, Appellants submit that mappings are not taught nor suggested by HTMLed or other form editors and neither are the modification of such mappings. Also, neither the Office Action nor Answer cite any references that teach a modified mapping or the storage of such a mapping in a project file.

II. CONCLUSION

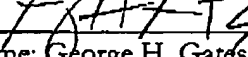
In light of the above arguments, Appellants respectfully submit that the cited references do not anticipate nor render obvious the claimed invention. More specifically, Appellants' claims recite novel physical features which patentably distinguish over any and all references under 35 U.S.C. §§ 102 and 103. As a result, a decision by the Board of Patent Appeals and Interferences reversing the Examiner and directing allowance of the pending claims in the subject application is respectfully solicited.

Respectfully submitted,

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APPENDIX

1. A method of displaying a relationship between an HTML file and an element from a form, wherein the element is in an HTML page, comprising:

reading information from a project file, the information comprising a relationship between the element that has been transferred from the form to the HTML page and the HTML file associated with the HTML page;

processing the information to map the element from the form to the HTML file; and

displaying the mapping on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

2. The method of claim 1, wherein the information is generated when the element is transferred from the form to the HTML page associated with the HTML file.

3. The method of claim 1, wherein the element is selected from a group comprising:
a visual control; and
a non-visual control, selected from a group comprising a button, a picklist, and a data entry box.

4. The method of claim 1, wherein the information comprises an element name and an HTML file name.

5. The method of claim 4, wherein the information further comprises a form name.

6. The method of claim 1, wherein the displaying the mapping comprises presenting an element name and an HTML file name in a row of a table.

7. The method of claim 6, wherein the table comprises cells defined by the row and the column of the cell, and the mapping is entered into a cell of the table.

8. The method of claim 1, wherein the displaying the mapping comprises presenting the element name and the HTML file name in a column of a table.

9. The method of claim 1, further comprising flagging an invalid mapping between the element and the HTML file.

10. The method of claim 9, wherein the flagging an invalid mapping between the element and the HTML file comprises:

reading the project file;

extracting the HTML filename from the project file;

searching for the HTML file using the extracted HTML filename; and

flagging the mapping as invalid when the extracted HTML file is not found.

11. The method of claim 1, further comprising:

accepting a modified mapping; and

storing the modified mapping in the project file.

12. A apparatus for displaying a relationship between an HTML file and an element from a form, wherein the element is in an HTML page, comprising:

means for reading information from a project file, the information comprising a relationship between the element that has been transferred from the form to the HTML page and the HTML file associated with the HTML page;

means for processing the information to map the element from the form to the HTML file; and

a display for presenting the mapping to a user on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

13. The apparatus of claim 12, wherein the information is generated when the element is transferred from the form to the HTML page associated with the HTML file.

14. The apparatus of claim 12, wherein the element is selected from a group comprising:
a visual control;
a non-visual control, selected from a group comprising a button, a picklist, and a data entry
box.

15. The apparatus of claim 12, wherein the information comprises an element name and
an HTML file name.

16. The apparatus of claim 15, wherein the information further comprises a form name.

17. The apparatus of claim 12, wherein the means for displaying the mapping comprises
means for presenting the element name and the HTML file name in a row of a table.

18. The apparatus of claim 17, wherein the table comprises cells defined by the row and
the column of the cell, and the mapping is entered into a cell of the table.

19. The apparatus of claim 12, wherein the means for displaying the mapping comprises
means for presenting the element name and the HTML file name in a column of a table.

20. The apparatus of claim 12, further comprising means for flagging an invalid mapping
between the element and the HTML file.

21. The apparatus of claim 20, wherein the means for flagging an invalid mapping
between the element and the HTML file comprises:

means for reading the project file;
means for extracting the HTML filename from the project file;
means for searching for the HTML file using the extracted HTML filename; and
means for flagging the mapping as invalid when the extracted HTML file is not found.

22. The apparatus of claim 12, further comprising:
means for accepting a modified mapping; and

means for storing the modified mapping in the project file.

23. An article of manufacture, embodying logic to perform a method of displaying a relationship between an HTML file and an element that has been transferred from a form to an HTML page, the method comprising:

reading information from a project file, the information comprising a relationship between an element that has been transferred from a form to an HTML page and the HTML file associated with the HTML page;

processing the information to map the element from the form to the HTML file; and

displaying the mapping on a graphical user interface that indicates the relationship between the element, the form, and the HTML file.

24. The article of manufacture of claim 23, wherein the information is generated when the element is transferred from the form to the HTML page associated with the HTML file.

25. The article of manufacture of claim 23, wherein the element is selected from a group comprising:

a visual control; and

a non-visual control, selected from a group comprising a button, a picklist, and a data entry box.

26. The article of manufacture of claim 23, wherein the information comprises an element name and an HTML file name.

27. The article of manufacture of claim 26, wherein the information further comprises a form name.

28. The article of manufacture of claim 23, wherein the displaying the mapping comprises presenting the element name and the HTML file name in a row of a table.

29. The article of manufacture of claim 28, wherein the table comprises cells defined by the row and the column of the cell, and the mapping is entered into a cell of the table.

30. The article of manufacture of claim 23, wherein the displaying the mapping comprises presenting the element name and the HTML file name in a column of a table.

31. The article of manufacture of claim 23, wherein the method further comprises flagging an invalid mapping between the element and the HTML file.

32. The article of manufacture of claim 31, wherein the flagging an invalid mapping between the element and the HTML file comprises:

- reading the project file;
- extracting the HTML filename from the project file;
- searching for the HTML file using the extracted HTML filename; and
- flagging the mapping as invalid when the extracted HTML file is not found.

33. The article of manufacture of claim 23, wherein the method further comprises:
accepting a modified mapping; and
storing the modified mapping in the project file.

34. A computer readable data structure for representing a software project in a single file, the software project comprising a project application defined by executable programming logic, and a project environment for developing the application, the data structure comprising:

- a first section comprising the executable programming logic needed to load and execute the project application in the computer; and

- a second section for storing data required to restore the project environment, and for storing information comprising a relationship between elements that have been transferred from a form to an HTML page and HTML files associated with the HTML page in the project;

- wherein the relationship between elements, the form, and the HTML file is displayed in a graphical user interface.